

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

MIGUEL SANCHEZ OCAMPO,

Defendant.

16-CR-172-FPG

**SENTENCING MEMORANDUM AND
CHARACTER LETTERS**

INTRODUCTION

1. I represent the defendant, Miguel Sanchez Ocampo (referred to as “Mr. Sanchez” in this memorandum). On February 1, 2017, Mr. Sanchez entered a guilty plea to a one-count Information charging a violation of 8 U.S.C. § 1326(a) and (b)(1) (reentry of a removed alien subsequent to a felony conviction). Sentencing is scheduled for April 20, 2017, at 12:00 PM. I submit the following sentencing memorandum on his behalf.

2. Mr. Sanchez has admitted that it was wrong for him to illegally enter the United States and he apologizes for the trouble that he has caused. He came to the United States to work and support his family. Mr. Sanchez has two children who were born in the United States (ages 5 and 2). He is married to Aida Ramirez Arrellano who is presently living in Buffalo with their children.

3. Prior to his arrest in October of 2016, Mr. Sanchez was working full-time as a cook to support his wife and their children. From 2014 to 2016 he worked as a cook at El Agave restaurant. While at El Agave he worked 6 days and over 40 hours per week, earning

approximately \$500 per week. (PSR at ¶ 64). Mr. Sanchez has worked his whole life, primarily as a cook, both in the United States and Mexico.

4. Mr. Sanchez now sees his wife and children when they visit him at the jail. He understands that he will be deported when he completes his sentence, but he is not sure what will happen to his family. He does understand that if he illegally reenters the United States, he will be facing even more time in jail. He intends to eventually seek permission to *legally* enter the United States.

5. Mr. Sanchez is a hard-working individual who came to the United States to make a better life for his family. He recognizes that he broke the law, and that his family is now suffering the consequences while he is in jail. He respectfully requests that the Court consider these factors and impose a sentence that is sufficient but not greater than necessary.

DATED: Buffalo, New York, April 18, 2017

Respectfully submitted,

/s/ Brian P. Comerford

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